

Disciplinary and Other FINRA Actions

Firm Fined, Individual Sanctioned

Pluris Capital Group, Inc. ([CRD® #30811](#), New York, New York) and John Fletcher ([CRD #2750926](#), Brooklyn, New York)

March 17, 2020 – A Letter of Acceptance, Waiver and Consent (AWC) was issued in which the firm was censured and fined \$20,000 and Fletcher was fined \$7,500 and suspended from association with any FINRA® member in all capacities for two months. A lower fine was imposed against the firm after considering, among other things, its revenue and financial resources. Without admitting or denying the findings, the firm and Fletcher consented to the sanctions and to the entry of findings that Fletcher, on behalf of the firm, negligently signed documents containing false statements. The findings stated that Fletcher knew that those documents would be submitted to a court to obtain judicial confirmation that securities issued in exchange for the satisfaction of claims against two companies would be deemed exempted securities and thus generally not subject to the registration requirements of Section 5 of the Securities Act of 1933. The statements were also material because they created the false impression that the firm was not timely paid for past work unrelated to the exchanges. This conduct contravened Section 17(a) (2) of the Securities Act and the firm received a total of \$30,030 in connection with the exchanges. The findings also stated that the firm failed to establish, maintain and enforce a supervisory system, including written supervisory procedures (WSPs), reasonably designed to achieve compliance with the registration requirements of Section 5 of the Securities Act. Despite the fact that the firm generated all of its revenue for one year from facilitating these exchanges, it did not implement reasonable systems or written procedures to determine whether securities issued in reliance on Section 3(a)(10) of the Securities Act were exempt from Section 5's registration requirements. Nor was there any system or procedures in place to supervise Fletcher, who took the lead for the firm on its work in connection with the exchanges, despite having no prior experience with the issuance of exempt securities under Section 3(a)(10) of the Securities Act.

The suspension is in effect from April 20, 2020, through June 19, 2020. ([FINRA Case #2018056477801](#))

Firms Fined

GFI Securities LLC ([CRD #19982](#), New York, New York)

March 11, 2020 – An AWC was issued in which the firm was censured and fined \$50,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to establish, document and maintain a system of risk management controls and supervisory

Reported for May 2020

FINRA has taken disciplinary actions against the following firms and individuals for violations of FINRA rules; federal securities laws, rules and regulations; and the rules of the Municipal Securities Rulemaking Board (MSRB).

procedures reasonably designed to manage the financial, regulatory and other risks related to the firm having market access and providing its customers with access to an alternative trading system (ATS). The findings stated that the firm's customers routed equity orders to its traders, who then routed certain of those trades directly to the ARCA or NASDAQ market. For those trades that the firm routed directly to the market, it used a third-party order management system (OMS) to manage the equity trading. In addition, the firm operated the ATS that operated sessions where interested buys and sells were matched. The firm failed to document its system of risk management controls and supervisory procedures reasonably designed to manage the risk of this business activity. The firm's WSPs for its market access rule compliance for those trades that it directed to the market through the OMS consisted only of the off-the-shelf OMS manual, which identified the various risk management controls available through the OMS. In addition, the firm's market access WSPs specific to the ATS contained only a description of available controls that customers subscribing to it could set. While the firm subsequently revised its written procedures for both the trades directed to the market through the OMS as well as for the ATS, those revisions included only general market access rule requirements and failed to document the firm's own system of risk management controls and supervisory procedures specifically tailored to those systems. In addition, the firm established a daily trading capital limit for its equity trading, but failed to document the basis or rationale for that determination. The findings also stated that the firm failed to establish risk management controls and supervisory procedures reasonably designed to prevent the entry of orders that exceeded appropriate pre-set credit thresholds in the aggregate for each of its customers. The firm failed to implement systematic pre-trade credit limits for its non-broker-dealer customers in the ATS. The findings also included that the firm failed to conduct an annual review one year to assure the overall effectiveness of its risk management controls and supervisory procedures with respect to the ATS, and failed properly to complete the required certification for that year that such risk management controls and supervisory procedures complied with appropriate rules. ([FINRA Case #2015048311501](#))

Bay Crest Partners, LLC ([CRD #39944](#), New York, New York)

March 18, 2020 – An AWC was issued in which the firm was censured, fined \$67,000 and required to revise its WSPs. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to properly qualify and register its chief compliance officer (CCO) as a Securities Trader Principal with FINRA. The findings stated that the CCO, who was a firm principal by virtue of her position as an officer of the firm, had supervisory responsibility over the securities trading activities of the firm's securities traders. The findings also stated that the firm's market access controls and supervisory procedures were unreasonable. The firm failed to establish risk management controls reasonably designed to prevent the entry of orders that exceeded appropriate pre-set credit thresholds in the aggregate for each customer by rejecting orders if such orders would exceed the applicable credit thresholds. The firm relied solely on customers' trading

activity in selecting customer credit thresholds. The thresholds the firm implemented, however, were not reasonably related to customers' actual trading activity. The firm failed to establish risk management controls and supervisory procedures reasonably designed to prevent the entry of erroneous orders, by rejecting orders that exceeded appropriate price or size parameters, on an order-by-order basis or that indicated duplicative orders. The findings also included that the firm failed to publish accurate and complete reports regarding its routing of customer orders and failed to conduct supervisory reviews of the reports. The firm also failed to notify its customers in writing at least annually of the availability of the firm's order routing statistics. ([FINRA Case #2017053082701](#))

Citigroup Global Markets Inc. ([CRD #7059](#), New York, New York)

March 19, 2020 – An AWC was issued in which the firm was censured and fined \$160,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to transmit Reportable Order Events (ROEs) to the Order Audit Trail System (OATS™) and improperly submitted route reports to OATS that it was not required to report. The findings stated that the firm submitted new order reports to OATS that did not require submission and transmitted ROEs that contained inaccurate, incomplete or improperly formatted data to OATS. The firm submitted corresponding trade reports to FINRA's transaction reporting facility (TRF) and over-the-counter reporting facility (OTCRF) that failed to include execution timestamps in milliseconds when the firm's system captured time in milliseconds. The findings also stated that the firm transmitted ROEs in tick size pilot securities to OATS that contained inaccurate, incomplete, or improperly formatted data. The findings also included the firm failed to establish and maintain a supervisory system reasonably designed to achieve compliance with applicable securities laws and regulations, and with applicable FINRA rules relating to OATS and trade reporting. The firm also failed to conduct supervisory reviews designed to detect whether it was submitting trade reports to OATS, the TRF and the OTCRF with timestamps in milliseconds. ([FINRA Case #2015046601401](#))

MML Investors Services, LLC ([CRD #10409](#), Springfield, Massachusetts)

March 20, 2020 – An AWC was issued in which the firm was censured and fined \$75,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to prevent certain registered and associated persons who had been terminated from the firm from continuing to access customer records and information, including non-public personal information, in violation of the U.S. Securities and Exchange Commission's (SEC) Regulation S-P: Privacy of Consumer Financial Information and Safeguarding Personal Information. The findings stated that the firm's parent company entered into an agreement and acquired a FINRA member firm from its parent insurance company. The firm failed to ensure that access to a third-party system was limited to only those former representatives of the acquired firm for whom access was agreed to be given. As a result, additional former representatives and associated persons

of the acquired firm had access to the third-party system after the acquisition. Because the firm was unaware that these additional representatives and associated persons had access to the third-party system after the acquisition, it did not notify the parent insurance company when those representatives and associated persons ceased to be associated with the firm. As a result, the parent insurance company did not timely shut off these former firm representatives' and associated persons' access to the third-party system. ([FINRA Case #2017056520301](#))

First Manhattan Co ([CRD #1845](#), New York, New York)

March 23, 2020 – An AWC was issued in which the firm was censured and fined \$100,000. The firm provided evidence that it has already paid restitution to customers in the total amount of \$48,220.64, plus interest. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to purchase municipal securities for its customers at prices that were fair and reasonable in relation to the prevailing market conditions. The findings stated that the firm bought municipal securities for its customers from an unaffiliated broker-dealer that was a counterparty for nearly all of its municipal securities transactions. The firm did not consider the prices being offered by other broker-dealers resulting in the transactions being executed at prices away from the market. The findings also stated that the firm failed to adopt, maintain and enforce WSPs reasonably designed to achieve compliance with Municipal Securities Rulemaking Board (MSRB) Rule G-30. Although a registered principal periodically reviewed summary, aggregate pricing data to determine whether the firm's pricing across all of its municipal securities transactions was comparable on average to market prices, the review was not reasonably designed to achieve compliance with MSRB Rule G-30 because aggregated data can obscure information about individual transactions. Later, the firm implemented new WSPs that required a comparison of the pricing of each municipal securities transaction against one or more independent sources. ([FINRA Case #2015047927501](#))

Ameritas Investment Company, LLC ([CRD #14869](#), Lincoln, Nebraska)

March 25, 2020 – An AWC was issued in which the firm was censured and fined \$10,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it provided underwriting services for a municipal issuer with which it had an active blanket financial advisory agreement, and thereby acted simultaneously as the issuer's financial advisor and its underwriter. ([FINRA Case #2018056443101](#))

Morgan Stanley Smith Barney LLC ([CRD #149777](#), Purchase, New York)

March 25, 2020 – An AWC was issued in which the firm was censured, fined \$300,000 and ordered to certify in writing, within 60 days, that it has reviewed its systems, policies and procedures, written and otherwise, governing its trade reporting of fixed income securities and as of the date of the certification, it has established and implemented systems, policies, and procedures, written and otherwise, governing the trade reporting of fixed income

securities that are reasonably designed to achieve compliance with FINRA Rule 6730(a) and MSRB Rule G-14. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to timely report fixed income transactions, a majority of which qualify as a large block transaction, to the Trade Reporting and Compliance Engine (TRACE®) or the Real-time Transaction Reporting System (RTRS). The findings stated that the untimely reports had several causes, including manual errors by firm employees and untimely amendments or corrections made to TRACE reports, and the improper set-up of relevant CUSIPs in the firm's reporting system. In addition, a coding error in the firm's TRACE reporting system caused prices in certain agency debt transactions to be reported to five decimal points instead of the required six decimal points. These trade reports failed to match with counter-party trade reports and were rejected by TRACE. The firm manually corrected the rejected trade reports but failed to do so within the specified timeframe. ([FINRA Case #2015047758201](#))

Arive Capital Markets (CRD #8060, Brooklyn, New York)

March 27, 2020 – An AWC was issued in which the firm was censured and fined \$45,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to develop and implement an anti-money laundering (AML) compliance program (AMLCP) reasonably designed to achieve and monitor its compliance with requirements of the Bank Secrecy Act and the implementing regulations thereunder. The findings stated that the firm failed to establish and implement policies and procedures that could be reasonably expected to detect and cause the reporting of potentially suspicious activity related to low-priced securities transactions. The firm's AML manual failed to explain how to identify or investigate suspicious trading activity, failed to list some of the most common red flags of suspicious activity, failed to address the process for identifying and assessing potential red flags associated with the sale of low-priced securities and did not provide guidance about how to utilize the reports and tools the firm had at its disposal to monitor for suspicious trading. The findings also stated that firm registered representatives had customer accounts that engaged in a pattern of trading shares in a particular low-priced security that comprised a significant volume of the total trading in the stock. The firm failed to take reasonable steps to identify, investigate and address numerous red flags, and because of these failures, the firm failed to detect the suspicious trading in the low-priced security. The findings also included that the firm failed to conduct annual independent testing on a calendar-year basis of its AMLCP. ([FINRA Case #2016048256701](#))

Individuals Barred

Louis Cook ([CRD #2469412](#), Staten Island, New York)

March 3, 2020 – An AWC was issued in which Cook was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Cook consented to the sanction and to the entry of findings that he made intentional misrepresentations to customers of his member firm that induced them to sign third-party authorization forms. The findings stated that the third-party authorization forms permitted the customers to designate Cook to make changes and/or withdraw funds from the policy value of their variable annuity to pay advisory fees. Many of these customers were elderly investors or the parents of developmentally disabled children who Cook had met through his approved outside business activity. Cook made a number of intentional misrepresentations in a cover letter that was accompanied by the third-party authorization form. The misrepresentations included that the third-party authorization forms were needed for him to continue to service the customers' variable annuity policies and that the forms were triggered by the Department of Labor's fiduciary rule. The findings also stated that Cook improperly used funds from the customers' variable annuities for his own personal use. Relying upon Cook's misrepresentations, the customers signed the third-party authorization forms, which Cook subsequently used to withdraw more than \$150,000 from the customer's variable annuity accounts. The customers did not intend to authorize Cook to withdraw funds from their variable annuities for his own personal use. ([FINRA Case #2018057690301](#))

Andre Pierre Davis ([CRD #1417097](#), Freehold, New Jersey)

March 3, 2020 – An AWC was issued in which Davis was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Davis consented to the sanction and to the entry of findings that he refused to produce information or documents requested by FINRA in connection with an investigation into allegations that he engaged in excessive and unsuitable trading in customer accounts while associated with his member firm. ([FINRA Case #2018057640301](#))

Daniel Joseph Arcuri Jr. ([CRD #2200431](#), Greensburg, Pennsylvania)

March 6, 2020 – An Office of Hearing Officers (OHO) decision became final in which Arcuri was barred from association with any FINRA member in all capacities. The sanction was based on the findings that Arcuri failed to appear for and provide on-the-record testimony requested by FINRA during its investigation into his outside business activities and potential misuse of customer funds. The findings stated that Arcuri's member firm filed a Uniform Termination Notice for Securities Industry Registration (Form U5) disclosing that it had terminated Arcuri for failing to seek and obtain its approval to engage in an outside business activity as the representative of the estate of a deceased client. ([FINRA Case #2017056688202](#))

David Lance Hall ([CRD #5508890](#), Bakersfield, California)

March 13, 2020 – An AWC was issued in which Hall was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Hall consented to the sanction and to the entry of findings that he refused to produce documents and information requested by FINRA during the course of its investigation into the reason his member firm terminated his registration. The findings stated that in a Form U5 the firm wrote that it had terminated Hall for failure to follow company procedures related to a premium fund account into which he deposited insurance premiums. Hall initially provided a partial but incomplete response to FINRA. Subsequently, Hall refused to produce the outstanding information and documents, notably financial records within his possession, custody, or control. ([FINRA Case #2019062256701](#))

James Blake Daughtry ([CRD #3272282](#), Dothan, Alabama)

March 18, 2020 – An AWC was issued in which Daughtry was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Daughtry consented to the sanction and to the entry of findings that he refused to appear for on-the-record testimony requested by FINRA in connection with an investigation into potentially fraudulent and unauthorized transactions in customer accounts. ([FINRA Case #2020065293201](#))

Rodney Robert Welsh Jr. ([CRD #5138609](#), Birmingham, Michigan)

March 18, 2020 – An AWC was issued in which Welsh was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Welsh consented to the sanction and to the entry of findings that he refused to appear for on-the-record testimony requested by FINRA during its investigation into the reasons for his termination from his member firm. The findings stated that the firm filed a Form U5 stating that Welsh had been terminated for failing to follow firm policy with respect to expense reimbursement unrelated to securities. ([FINRA Case #2018060947101](#))

Dana Bruce Vietor ([CRD #873129](#), Dallas, Texas)

March 23, 2020 – An AWC was issued in which Vietor was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Vietor consented to the sanction and to the entry of findings that he engaged in the sale of promissory notes with customers totaling more than \$3 million without disclosing and receiving approval from his member firms for each individual private securities transaction. The findings stated that Vietor, along with other business partners, was engaged in a start-up business venture that required funding. Initially, the business venture raised funds by way of private placement offerings. Vietor disclosed to the firms his participation in the private placements, as well as his participation in the business venture. However, later the business venture raised funds for entities associated with it by selling the undisclosed promissory notes. Vietor is a member of the management team that manages these entities and has membership interests in each. Therefore, Vietor received indirect selling compensation. ([FINRA Case #2018060199101](#))

James Gregory McKinney ([CRD #2100850](#), Mannford, Oklahoma)

March 26, 2020 – An OHO decision became final in which McKinney was barred from association with any FINRA member in all capacities. The sanction was based on findings that McKinney failed to comply with FINRA's requests for information and documents and to appear for on-the-record testimony during the course of its investigation into his possible participation in undisclosed private securities transactions. The findings stated that the investigation later expanded to look into McKinney's possible failure to disclose tax liens on his Uniform Application for Securities Industry Registration or Transfer forms (Form U4). ([FINRA Case #2018057829001](#))

Steven Dale Rodemer ([CRD #830561](#), Colorado Springs, Colorado)

March 26, 2020 – An AWC was issued in which Rodemer was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Rodemer consented to the sanction and to the entry of findings that he refused to provide on-the-record testimony requested by FINRA during its investigation into the conduct disclosed in a Form U5 submitted by his member firm. The findings stated that the firm submitted the Form U5 terminating Rodemer for taking money from a client account for his personal use without authorization. ([FINRA Case #2020065336501](#))

Demauro Cortez Clark ([CRD #6945280](#), Acworth, Georgia)

March 27, 2020 – An AWC was issued in which Clark was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Clark consented to the sanction and to the entry of findings that he converted \$16,560 from an elderly customer of his member firm and used the funds for his personal expenses. The findings stated that Clark opened an individual brokerage account in the customer's name at a broker-dealer unaffiliated with the firm and funded it with money from the customer's savings account. Clark later opened another brokerage account at the same broker-dealer in his and the customer's name without the customer's knowledge or consent. Clark used these accounts to transfer \$16,560 from the customer's firm and bank savings accounts into Clark's personal checking account held at an unaffiliated credit union. Clark knew that the funds did not belong to him, and each of the transfers was made without the customer's knowledge or consent. ([FINRA Case #2019064268201](#))

James Andrew Gallego ([CRD #6226068](#), Austin, Texas)

March 27, 2020 – An AWC was issued in which Gallego was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Gallego consented to the sanction and to the entry of findings that he refused to provide documents and information requested by FINRA in connection with its investigation into his potential involvement in the movement of funds belonging to a senior customer at his member firm. ([FINRA Case #2019062736301](#))

Kimberly Ann Springsteen-Abbott ([CRD #1367633](#), Holiday, Florida)

March 27, 2020 – Springsteen-Abbott appealed an SEC decision to the U.S. Court of Appeals for the District of Columbia Circuit. The SEC decision affirmed the NAC's findings and modified the sanctions imposed. The sanctions were based on the findings that, Springsteen-Abbott, a general partner of investment funds sold by her member firm and sponsored by its parent company, improperly allocated personal expenses, control person expenses and expenses for the broker-dealer to the investment funds. The findings stated that Springsteen-Abbott had sole responsibility for determining whether charges were business expenses allocable to the funds and had final approval of the allocations. Springsteen-Abbott was barred from association with any FINRA member in all capacities and ordered to pay disgorgement in the amount of \$36,225.85, plus prejudgment interest. The bar is in effect pending review. ([FINRA Case #2011025675501](#))

Gerald Roger Dewes ([CRD #2465538](#), East Amherst, New York)

March 30, 2020 – An AWC was issued in which Dewes was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Dewes consented to the sanction and to the entry of findings that he refused to appear for on-the-record testimony requested by FINRA in connection with an investigation into his potential participation in undisclosed private securities transactions and outside business activities. ([FINRA Case #2019064639701](#))

Ashley K. Martin ([CRD #4628096](#), Olathe, Kansas)

March 30, 2020 – An AWC was issued in which Martin was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Martin consented to the sanction and to the entry of findings that she failed to provide information and documents requested by FINRA in connection with its investigation into allegations that she altered customer forms after they were signed by customers of her member firm. ([FINRA Case #2019064038501](#))

Individuals Suspended

Chad P. Meyer ([CRD #4213067](#), Venice, Florida)

March 2, 2020 – An AWC was issued in which Meyer was assessed a deferred fine of \$5,000 and suspended from association with any FINRA member in all capacities for one month. Without admitting or denying the findings, Meyer consented to the sanctions and to the entry of findings that he engaged in an outside business activity for which he received compensation without providing prior written notice to his member firm. The findings stated that Meyer had ownership interest in, and was responsible for maintaining the financial records of, a property and casualty insurance company. Meyer received approximately \$34,754 in income as a direct result of this outside business activity.

The suspension was in effect from March 2, 2020, through April 1, 2020. ([FINRA Case #2019061376901](#))

Steven S. Maher Sr. ([CRD #1011535](#), Brick, New Jersey)

March 3, 2020 – An AWC was issued in which Maher was fined \$10,000 and suspended from association with any FINRA member in all capacities for two months. Without admitting or denying the findings, Maher consented to the sanctions and to the entry of findings that he on multiple occasions obtained a customer's signature on a partially completed variable annuity disclosure form and used a photocopy of the signature page to complete additional forms that were required to obtain his member firm's approval of the transaction he was recommending to the customer. The findings stated that in all cases, the customer authorized the recommended transaction and received a copy of the completed form before the transactions were completed.

The suspension is in effect from April 6, 2020, through June 5, 2020. ([FINRA Case #2017055286901](#))

Billy Hai Zhang ([CRD #5510158](#), South Pasadena, California)

March 3, 2020 – An AWC was issued in which Zhang was assessed a deferred fine of \$5,000 and suspended from association with any FINRA member in all capacities for 15 business days. Without admitting or denying the findings, Zhang consented to the sanctions and to the entry of findings that he settled a customer complaint without his member firm's knowledge or approval. The findings stated that Zhang received a written communication from a customer at the firm in which the customer complained about the use of proceeds from the partial redemption of a variable life insurance product. The \$10,600 in proceeds were used to reinstate a separate policy that had lapsed due to the non-payment of premiums. Zhang paid \$10,600 to settle the customer's complaint.

The suspension was in effect from March 16, 2020, through April 3, 2020. ([FINRA Case #2018057646701](#))

Imran Nazir Razvi ([CRD #3042006](#), Frederick, Maryland)

March 5, 2020 – An AWC was issued in which Razvi was assessed a deferred fine of \$5,000 and suspended from association with any FINRA member in all capacities for six months. Without admitting or denying the findings, Razvi consented to the sanctions and to the entry of findings that he engaged in an outside business activity notwithstanding that his member firm denied his request to do so. The findings stated that Razvi sought approval to use a company he formed to refer investors to a purported real-estate investment fund. Razvi's firm denied his request and notified him that he could not accept compensation or consideration for referrals to the fund. Contrary to that denial, the company's agents referred investors to the fund and in exchange for these referrals, the agents received commissions. The commissions the agents earned were paid to the company. Razvi, through his ownership of the company, received a portion of those commissions. Later, the fund filed a voluntary Chapter 11 bankruptcy petition. The U.S. District Court for the

Southern District of Florida issued final judgements against, among others, the fund and its former owner. Those judgments required the fund and its owner to, among other things, disgorge their ill-gotten gains and also required the owner to pay a civil penalty.

The suspension is in effect from March 16, 2020, through September 15, 2020. ([FINRA Case #2018058057401](#))

John Stuart Crain ([CRD #2748785](#), Reisterstown, Maryland)

March 6, 2020 – An AWC was issued in which Crain was fined \$5,000 and suspended from association with any FINRA member in all capacities for three months. Without admitting or denying the findings, Crain consented to the sanctions and to the entry of findings that he asked customers of his member firm to sign and return to him blank or incomplete brokerage documents with the customers' understanding that Crain would add the missing information. The findings stated that the firm warned Crain that such conduct was prohibited after discovering a blank customer-signed document in his files. Upon receipt of the customer-signed documents, Crain altered them by filling in the missing information on each document. All of the information that Crain added to the documents was accurate. Crain then submitted these documents as originals to the firm in order to effect transactions, all of which were requested by the customers.

The suspension is in effect from April 6, 2020, through July 5, 2020. ([FINRA Case #2018057708301](#))

Benjamin Kaz Fujihara ([CRD #2696451](#), Frisco, Texas)

March 6, 2020 – An AWC was issued in which Fujihara was fined \$5,000 and suspended from association with any FINRA member in all capacities for 30 business days. Without admitting or denying the findings, Fujihara consented to the sanctions and to the entry of findings that he engaged in outside business activities without providing full and accurate prior written notice to his member firm. The findings stated that Fujihara requested in writing that his firm approve his participation in an outside business that engaged in gunsmithing activities, such as restoring and performing woodworking services on firearms. The firm approved Fujihara's participation in the proposed outside business, provided that he limit his role to gunsmithing activities and not use his federal firearms license as a dealer of firearms. The firm also advised Fujihara that he would need to obtain written approval before making any changes to his outside business activity or seeking to participate in any additional outside business activities. Later, Fujihara purchased and resold a small number of firearms through his outside business without performing any woodworking or other gunsmithing services on the firearms before selling them.

The suspension is in effect from April 6, 2020, through May 15, 2020. ([FINRA Case #2018059475401](#))

William Blake McGowan ([CRD #6385231](#), Little Rock, Arkansas)

March 13, 2020 – An AWC was issued in which McGowan was assessed a deferred fine of \$7,500 and suspended from association with any FINRA member in all capacities for 30 business days. Without admitting or denying the findings, McGowan consented to the sanctions and to the entry of findings that he participated in a private securities transaction without providing prior written notice to his member firm. The findings stated that McGowan purchased securities totaling \$55,000 in a pooled real estate investment. Specifically, McGowan purchased shares of a company formed to purchase and manage a vacation rental property in Florida. The purchase that McGowan made on his own behalf was outside the scope of his employment with the firm. The findings also stated that McGowan signed and submitted an annual compliance attestation to the firm wherein he falsely represented that he had not made any personal investments that he had not disclosed to it.

The suspension was in effect from March 16, 2020, through April 27, 2020. ([FINRA Case #2019064384101](#))

Quincy DeEarl Caldwell ([CRD #5583424](#), Katy, Texas)

March 16, 2020 – An AWC was issued in which Caldwell was assessed a deferred fine of \$5,000 and suspended from association with any FINRA member in all capacities for three months. Without admitting or denying the findings, Caldwell consented to the sanctions and to the entry of findings that he recommended and effected unsuitable short-term trades in Class A mutual fund shares in customer accounts, including mutual fund switches in those accounts. The findings stated that Caldwell's unsuitable recommendations caused his customers to incur approximately \$57,820 in upfront sales charges for Class A mutual fund shares. Caldwell did not have a reasonable basis to believe that his recommended patterns of short-term trading and mutual fund switching were suitable for his customers in view of the frequency and cost of the transactions. Caldwell's former member firm provided restitution to the affected customers, with Caldwell contributing financially pursuant to a settlement agreement between him and the firm.

The suspension is in effect from March 16, 2020, June 15, 2020. ([FINRA Case #2018060233501](#))

Andre Derricotte ([CRD #5932089](#), South Orange, New Jersey)

March 16, 2020 – An AWC was issued in which Derricotte was assessed a deferred fine of \$5,000 and suspended from association with any FINRA member in all capacities for two years. Without admitting or denying the findings, Derricotte consented to the sanctions and to the entry of findings that he possessed and accessed unauthorized materials, including personal notes, writing instruments and a cellular phone, while sitting for the Uniform Combined State Law Examination (Series 66). The findings stated that Derricotte

later sat for the Uniform Investment Adviser Law Examination (Series 65) during which he also possessed and accessed unauthorized materials, including personal notes and writing instruments.

The suspension is in effect from March 16, 2020, through March 15, 2022. ([FINRA Case #2019063885101](#))

Caleb Austin Jamison ([CRD #5645954](#), Cabot, Arizona)

March 16, 2020 – An AWC was issued in which Jamison was assessed a deferred fine of \$7,500 and suspended from association with any FINRA member in all capacities for 30 business days. Without admitting or denying the findings, Jamison consented to the sanctions and to the entry of findings that he participated in a private securities transaction without providing prior written notice to his member firm. The findings stated that Jamison purchased securities on his own behalf in a pooled real estate investment totaling \$15,000. The purchase was outside the scope of Jamison's employment with the firm. The findings also stated that Jamison signed and submitted an annual compliance attestation to his firm in which he falsely represented that he had not made any personal investments that he had not disclosed to the firm.

The suspension was in effect from March 16, 2020, through April 27, 2020. ([FINRA Case #2019064384001](#))

Frederic Thomas O'Hara ([CRD #351490](#), Stuart, Florida)

March 16, 2020 – An AWC was issued in which O'Hara was assessed a deferred fine of \$10,000 and suspended from association with any FINRA member in all capacities for nine months. Without admitting or denying the findings, O'Hara consented to the sanctions and to the entry of findings that he engaged in an outside business activity by serving as an outside director of a private company without providing prior written notice to his member firms. The findings stated that as an outside director at the company, O'Hara attended board meetings and provided the company's founder, officers and directors with business and financial advice. In connection with his services as director, the company issued company shares to O'Hara. The findings also stated that O'Hara participated in private securities transactions in the company's shares totaling \$63,000, including his own \$10,000 purchase, without providing his firms with prior written notice. The findings also included that O'Hara misrepresented to one of his firms that he had never discussed the company with any of his securities clients. FINRA found that O'Hara provided a customer with sales materials, including promotional DVDs and year-end account summaries that contained valuations of the company's shares. The DVDs did not contain risk disclosures and the summaries lacked a reasonable basis to evaluate the valuations.

The suspension is in effect from March 16, 2020, through December 15, 2020. ([FINRA Case #2017054659401](#))

Tishon Lamon Afanador ([CRD #5026608](#), Deer Park, New York)

March 17, 2020 – An AWC was issued in which Afanador was assessed a deferred fine of \$5,000 and suspended from association with any FINRA member in all capacities for six months. Without admitting or denying the findings, Afanador consented to the sanctions and to the entry of findings that he willfully failed to timely amend his Form U4 to disclose that he had been charged with, and pled guilty to, felony charges. The findings stated that Afanador was arrested and subsequently charged with felony counts of aggravated unlicensed operation of a motor vehicle in the first degree. Afanador was arraigned on and pled guilty to these charges. At a later date, Afanador was also arrested and charged with a felony count of criminal possession of a controlled substance in the fifth degree.

The suspension is in effect from April 6, 2020, through October 5, 2020. ([FINRA Case #2019061868302](#))

Halil Kozi ([CRD #1121714](#), North Middletown, New Jersey)

March 17, 2020 – An Offer of Settlement was issued in which Kozi was suspended from association with any FINRA member in all capacities for two years. In light of Kozi's financial status, no monetary sanction has been imposed. Without admitting or denying the allegations, Kozi consented to the sanction and to the entry of findings that he recommended trading in a customer's account that was excessive, quantitatively unsuitable and inconsistent with the customer's moderate risk tolerance and balanced growth investment objective, as evidenced by the account's annualized cost-to-equity ratio of 53 percent. The findings stated that the customer deposited a little over \$200,000 in his account at Kozi's member firm. Within the span of about a year and half, Kozi recommended equity and options transactions, with a principal value of over \$3 million. Kozi's recommended transactions for the customer's account generated gross commissions totaling over \$135,000, of which Kozi himself received over \$87,000, while causing the customer's account to incur losses of nearly \$72,000. Commissions from this customer's account made up 95 percent of Kozi's commission income. The findings also stated that Kozi recommended options transactions that were unsuitable given the high level of speculation involved, as well as the transaction costs incurred when considered in the context of the customer's investment objective, risk tolerance and financial situation and needs. Kozi lacked a reasonable basis to believe that the customer was aware of and understood the risks associated with the options trading he recommended, as the customer had no experience trading options and many of the options trades Kozi recommended were speculative and intended for sophisticated options investors. Kozi also lacked a reasonable basis to recommend that the customer purchase stock in a single speculative security in quantities that caused the stock at one point to make up 85 percent of the customer's account value.

The suspension is in effect from April 6, 2020, through April 5, 2022. ([FINRA Case #2016048921102](#))

Taylor Cade Hoskins ([CRD #6277263](#), Wauwatosa, Wisconsin)

March 18, 2020 – An AWC was issued in which Hoskins was fined \$5,000 and suspended from association with any FINRA member in all capacities for 10 business days. Without admitting or denying the findings, Hoskins consented to the sanctions and to the entry of findings that he improperly used his member firm's login credentials to access its third-party system for storing customer records and information, and then downloaded and printed non-public personal customer information from that system to assist him with transitioning customers to his new firm.

The suspension was in effect from April 6, 2020, through April 20, 2020. ([FINRA Case #2018059726301](#))

Scott Patrick Kozak ([CRD #1272583](#), Highlands Ranch, Colorado)

March 18, 2020 – An AWC was issued in which Kozak was assessed a deferred fine of \$10,000 and suspended from association with any FINRA member in all capacities for two years. Without admitting or denying the findings, Kozak consented to the sanctions and to the entry of findings that he participated in three sets of private securities transactions without providing prior written notice to his member firm. The findings stated that Kozak solicited firm customers and registered representatives of the firm to invest \$1,166,000 in the securities of two companies and also invested his own funds in both of the companies. During an audit, Kozak falsely advised the auditor, and later falsely told his firm's CCO, that no firm customers had invested in the company that was the subject of the second and third private securities transactions. The findings also stated that Kozak engaged in an outside business activity, without notifying his firm, by forming a company through which he purchased the assets of, and operated, the company that was the subject of the second and third private securities transactions. The findings also included that Kozak falsely stated in annual firm compliance questionnaires that he had not engaged in any private securities transactions and that he had complied with the firm's outside business activity policy.

The suspension is in effect from April 6, 2020, through April 5, 2022. ([FINRA Case #2017053017203](#))

Sofia T. Gonzalez ([CRD #6243469](#), Houston, Texas)

March 19, 2020 – An AWC was issued in which Gonzalez was assessed a deferred fine of \$5,000 and suspended from association with any FINRA member in all capacities for two months. Without admitting or denying the findings, Gonzalez consented to the sanctions and to the entry of findings that she shared in losses incurred by customers of her member firm, without the firm's prior knowledge or approval and without having previously contributed to the accounts. The findings stated that Gonzalez provided the customers with information about various certificates of deposit (CDs) offered by the firm. Both customers purchased a CD in the amount of \$150,000 and \$200,000, respectively, in their

firm accounts after discussing the CD with Gonzalez. The next day, Gonzalez informed the customers that she made an error in describing the CD's terms. The customers sold the CD for realized losses and Gonzalez agreed to reimburse them for those amounts. Gonzalez purchased cashier's checks in the amounts of \$511.80 and \$722.40, respectively, with funds drawn from her personal bank account and sent them to the customers, who deposited the checks in their firm accounts. The findings also stated that Gonzalez caused her firm to maintain incomplete books and records. Gonzalez communicated with the customers regarding activity in their firm accounts by text messages sent from her personal cellular device. These communications related to the firm's business but were not preserved by the firm as required by Section 17(a) of the Securities Exchange Act of 1934.

The suspension is in effect from April 6, 2020, through June 5, 2020. ([FINRA Case #2019061778602](#))

Jennifer Lillian Basey ([CRD #4730054](#), Lehigh Acres, Florida)

March 24, 2020 – An AWC was issued in which Basey was fined \$5,000 and suspended from association with any FINRA member in all capacities for two months. Without admitting or denying the findings, Basey consented to the sanctions and to the entry of findings that she falsified a customer's signature and forged additional customers' initials on paperwork used to facilitate her customers' transfers of funds. The findings stated that Basey signed, with permission, the first customer's name on a document used to facilitate an authorized transfer of that customer's assets. Additionally, Basey forged the initials of two other customers, who are married, on forms to facilitate the transfer of the customers' funds from another financial institution to her member firm. Prior to signing these customers' initials, Basey had not received authorization to do so. The customers subsequently ratified Basey's conduct in writing. The firm's WSPs required its representatives to take reasonable steps to ensure customer signatures were original and authentic, which Basey failed to do.

The suspension is in effect from April 20, 2020, through June 19, 2020. ([FINRA Case #2019064947501](#))

Charles Henry Postel ([CRD #1478786](#), Lakewood, Ohio)

March 24, 2020 – An AWC was issued in which Postel was assessed a deferred fine of \$5,000 and suspended from association with any FINRA member in all capacities for 15 business days. Without admitting or denying the findings, Postel consented to the sanctions and to the entry of findings that he effected pairs of agency cross transactions in municipal securities between his member firm's customers without obtaining the required customer written acknowledgements and the firm's written approval. The findings stated that each of the pairs of municipal bond transactions were structured by Postel in a similar manner, with the firm selling municipal bonds as agent on behalf of one of its customers to another broker-dealer and then buying the same bonds back on the same day from the same broker-dealer as agent on behalf of another customer. In addition, for

each of the pairs of municipal bond transactions, Postel determined the amount of the mark-up that could be charged by the other broker-dealer for effecting these transactions. Postel violated his firm's policies and procedures by not obtaining the required customer acknowledgments and the approval of his branch manager or branch office administrator prior to effecting these pairs of transactions.

The suspension was in effect from April 6, 2020, through April 27, 2020. ([FINRA Case #2018057286801](#))

William James Hite ([CRD #1675972](#), Shelton, Connecticut)

March 30, 2020 – An AWC was issued in which Hite was assessed a deferred fine of \$7,500 and suspended from association with any FINRA member in all capacities for six months. Without admitting or denying the findings, Hite consented to the sanctions and to the entry of findings that he forged an elderly customer's signature on documents in connection with an exchange transaction from a variable annuity to a fixed annuity. The findings stated that Hite forged the customer's handwritten signature in one instance and electronically forged the customer's signature in other instances. Hite's forgeries are aggravated by the fact that in order to authenticate the electronic signatures he re-created an email address previously used by the customer and used it to verify the forged electronic signatures. Unbeknownst to Hite, the customer had passed away prior to the forgeries. Although the customer had previously signed these documents, Hite was not authorized to sign for the customer. Hite submitted the transaction related documents to his member firm for processing as originals signed by the customer.

The suspension is in effect from April 6, 2020, through October 5, 2020. ([FINRA Case #2018058923701](#))

Mark Thomas Lamkin ([CRD #2121510](#), Louisville, Kentucky)

March 30, 2020 – An AWC was issued in which Lamkin was fined \$7,500 and suspended from association with any FINRA member in all capacities for three months. Without admitting or denying the findings, Lamkin consented to the sanctions and to the entry of findings that he borrowed a total of \$1,265,000 from a customer whose account he serviced without notifying his member firm or obtaining its written approval. The findings stated that Lamkin's customer was a longtime friend who was also a customer of the firm. The first loan in the amount of \$740,000, was made via a promissory note signed by Lamkin's wife and secured by a mortgage identifying Lamkin and his wife as the borrowers and signed by both. That loan has been repaid in full. The second loan, in the amount of \$250,000, was negotiated between Lamkin and the customer and memorialized by a note signed by Lamkin's wife. The third loan, in the amount of \$275,000, was made to a limited liability company of which Lamkin was a member and initially was memorialized by a note signed by Lamkin and his business partner. While the second and third loans have not been repaid in full, they are currently in repayment. The customer was not Lamkin's family

member and the firm's WSPs prohibited registered representatives from borrowing money from a customer unless the customer was a family member. The findings also stated that in his firm's annual compliance questionnaires, Lamkin falsely affirmed that neither he nor any related person or entity had borrowed or loaned any money or securities from or to another individual or entity.

The suspension is in effect from April 20, 2020, through July 19, 2020. ([FINRA Case #2018057964201](#))

Genesis E. Zschocher (CRD #7091780, Tampa, Florida)

March 31, 2020 – An AWC was issued in which Zschocher was assessed a deferred fine of \$5,000 and suspended from association with any FINRA member in all capacities for two months. Without admitting or denying the findings, Zschocher consented to the sanctions and to the entry of findings that she misrepresented to her member firm the results of multiple FINRA Securities Industry Essentials exams, both orally and in writing. The findings stated that Zschocher created a modified version of her official score report reflecting an inaccurate score and provided it to her firm supervisor for one exam attempt.

The suspension is in effect from April 6, 2020, through June 5, 2020. ([FINRA Case #2019063287401](#))

Complaints Filed

FINRA issued the following complaints. Issuance of a disciplinary complaint represents FINRA's initiation of a formal proceeding in which findings as to the allegations in the complaint have not been made, and does not represent a decision as to any of the allegations contained in the complaint. Because these complaints are unadjudicated, you may wish to contact the respondents before drawing any conclusions regarding the allegations in the complaint.

Raymond Alexander Thomas (CRD #1675282, Brooklyn, New York)

March 6, 2020 – Thomas was named a respondent in a FINRA complaint alleging that he engaged in outside business activities through a company he formed and controlled without providing prior notice to his member firm, written or otherwise. The complaint alleges that Thomas functioned and held himself out as an officer, director and employee of the company. Thomas caused the company to enter into a number of agreements, including a consulting agreement with an international venture capitalist. Many of those agreements show that Thomas had the reasonable expectation of compensation for the activities he performed on behalf of the company and, in fact, he was compensated for the outside business activities he performed for it. Thomas opened bank accounts in the company's name, used those bank accounts to receive numerous third-party wire

deposits from entities and individuals with whom the company conducted business, and thereafter withdrew cash from the accounts or used the proceeds to pay for his personal expenses. The complaint also alleges that Thomas repeatedly provided false or misleading information to FINRA in an effort to conceal that he was engaged in outside business activities. During a branch examination, Thomas falsely told FINRA that he did not participate in any outside business activities. Likewise, when FINRA requested that Thomas identify all bank accounts that he controlled, for which he had signatory authority, or in which he had a beneficial interest, Thomas did not identify any of the bank accounts that he had established for the company, even though he had withdrawn nearly \$100,000 from those accounts in the preceding 14 months. Finally, when FINRA took Thomas' sworn testimony, he falsely testified, among other things, that his mother had created the company and that he did not have control of, or signatory authority for, any of its bank accounts. ([FINRA Case #2017056561101](#))

David Ray Oakes (CRD #1465154, Prosper, Texas)

March 11, 2020 – Oakes was named a respondent in a FINRA complaint alleging that he structured cash deposits and cash withdrawals totaling \$61,500 for the purpose of attempting to evade federal reporting requirements. The complaint alleges that Oakes acted with the purpose of preventing a bank from filing, and intended to cause the bank to fail to file Currency Transaction Reports reporting currency transactions in excess of \$10,000. ([FINRA Case #2018057755201](#))

Steven Harris (CRD #2440292, Chicago, Illinois)

March 31, 2020 – Harris was named a respondent in a FINRA complaint alleging that he manufactured faked documents that he then provided to FINRA in response to its requests during an investigation of his undisclosed outside business activity. The complaint alleges that FINRA requested that Harris provide certain financial information and bank statements and, in response, he provided false and incomplete information to FINRA. Harris failed to disclose the accounts he actually held and provide the requested statements for those accounts. Instead, Harris created fake bank statements for other accounts he purported to hold and provided the manufactured documents to FINRA. The complaint also alleges that Harris repeatedly lied about his actions during on-the-record testimony, falsely claiming that he did not alter any of the records that he produced to FINRA. The complaint further alleges that Harris engaged in an undisclosed outside business activity for compensation. The outside business activity involved securities investment research and advice for which he was paid \$750. ([FINRA Case #2019062092401](#))

**Firms Expelled for Failure to Pay Fines and/
or Costs Pursuant to FINRA Rule 8320**

CV Brokerage, Inc (CRD #462)
Williamstown, New Jersey
(March 14, 2020)
FINRA Case #2017052325902

**Midtown Partners & Co., LLC
(CRD #104223)**
Land O Lakes, Florida
(March 14, 2020)
FINRA Case #2016051196101

**Firm Expelled for Failure to Provide
Information or Keep Information Current
Pursuant to FINRA Rule 9552**

Clinger & Co., Inc. (CRD #1471)
Houston, Texas
(March 5, 2020)
FINRA Case #2019060782901

**Firm Cancelled for Failure to Pay FINRA
Dues, Fees and Other Charges Pursuant to
FINRA Rule 9553**

Forest Securities, Inc. (CRD #16255)
Hillside, Illinois
(March 10, 2020)

**Firm Suspended for Failure to Provide
Information or Keep Information Current
Pursuant to FINRA Rule 9552**

(The date the suspension began is listed
after the entry. If the suspension has
been lifted, the date follows the
suspension date.)

Chapwood Securities, Inc. (CRD #154376)
Plano, Texas
(March 9, 2020 – April 2, 2020)

**Firm Suspended for Failure to Pay FINRA
Dues, Fees and Other Charges Pursuant to
FINRA Rule 9553**

(The date the suspension began is listed
after the entry. If the suspension has
been lifted, the date follows the
suspension date.)

**GrowthFountain Capital, LLC (Funding
Portal Org ID #283380)**
New York, New York
(December 3, 2019 – March 18, 2020)

**Individual Revoked for Failure to Pay Fines
and/or Costs Pursuant to FINRA Rule 8320**

(If the revocation has been rescinded, the
date follows the revocation date.)

James Marten Lamont (CRD #2846228)
Novato, California
(March 14, 2020)
FINRA Case #2017052705801

Individuals Barred for Failure to Provide Information or Keep Information Current Pursuant to FINRA Rule 9552(h)
 (If the bar has been vacated, the date follows the bar date.)

George Belesis (CRD #4860444)

West Hollywood, California
 (March 9, 2020)
 FINRA Case #2019061940901

Dustin Michael Blount (CRD #5267680)

Vicksburg, Mississippi
 (March 9, 2020)
 FINRA Case #2019061481901

Barry Flynn Carson (CRD #6376758)

Church Hill, TN
 (March 16, 2020)
 FINRA Case #2019063784901

Felix S. Chu (CRD #2427593)

Pleasant Hill, California
 (March 9, 2020)
 FINRA Case #2019064165601

Brian Francis Kealoha Colburn (CRD #2357275)

Wilton, Connecticut
 (March 3, 2020)
 FINRA Case #2019063916501

Prithviraj Dhandapani (CRD #6761150)

Oak Ridge, Tennessee
 (March 13, 2020)
 FINRA Case #2019061676601

Michael Scott Drury (CRD #5766920)

Sandy, Utah
 (March 2, 2020)
 FINRA Case #2019062607001

Davrion Jarrell Hemphill (CRD #7027587)

Roseville, Michigan
 (March 16, 2020)
 FINRA Case #2019064037901

Robert Hoon Lee (CRD #5916602)

Diamond Bar, California
 (March 5, 2020)
 FINRA Case #2019063796001

Eric Alan Zakarin (CRD #1708397)

Cranford, New Jersey
 (March 2, 2020)
 FINRA Case #2018060108301

Individuals Suspended for Failure to Provide Information or Keep Information Current Pursuant to FINRA Rule 9552(d)

(The date the suspension began is listed after the entry. If the suspension has been lifted, the date follows the suspension date.)

Robert Joseph Cacioppo (CRD #6205736)

Surprise, Arizona
 (March 2, 2020)
 FINRA Case #2019064813201

Paula Yvette Collins (CRD #3190350)

Aurora, Colorado
 (March 23, 2020)
 FINRA Case #2019064939501

Michael Christopher Davis (CRD #4865849)

New York, New York
 (March 9, 2020)
 FINRA Case #2019064746401

Megan Elizabeth Hoffman (CRD #6109030)

Delaware, Ohio
 (March 19, 2020)
 FINRA Case #2019064723101

Jody L. Pullium (CRD #3272304)
East Peoria, Illinois
(March 20, 2020)
FINRA Case #2019064573501

Ana Catalina Rivera (CRD #5667950)
Miami, Florida
(March 9, 2020)
FINRA Case #2019062852501

John Joseph Santariello (CRD #5746158)
Farmingville, New York
(March 30, 2020)
FINRA Case #2019063888701

**George Anthony Schmidt Jr.
(CRD #1082936)**
East Islip, New York
(March 9, 2020)
FINRA Case #2019064725501

Ricardo Turlan (CRD #4431836)
Boerne, Texas
(March 16, 2020)
FINRA Case #2019063490101

Kevin Fredrick Williams (CRD #2492215)
Carlsbad, California
(March 16, 2020)
FINRA Case #2019062134601

**Individuals Suspended for Failure to
Comply with an Arbitration Award
or Related Settlement or an Order of
Restitution or Settlement Providing for
Restitution Pursuant to FINRA Rule Series
9554**

(The date the suspension began is listed
after the entry. If the suspension has
been lifted, the date follows the
suspension date.)

Thomas Herbert Bock (CRD #806182)
Denver, Colorado
(March 10, 2020)
FINRA Arbitration Case #14-03857

Richard Lyndon Brown (CRD #3245291)
Massapequa, New York
(March 27, 2020)
FINRA Arbitration Case #19-02719

Mary Catherine Evans (CRD #1091961)
Denver, Colorado
(March 10, 2020)
FINRA Arbitration Case #14-03857

Matthew Hamel Francis (CRD #4075106)
San Diego, California
(January 8, 2014 – March 25, 2020)
FINRA Arbitration Case #11-03789

James Hal Heafner (CRD #4837072)
Charlotte, North Carolina
(March 31, 2020)
FINRA Arbitration Case #19-03613

**Christopher Clarence Kennedy (CRD
#2031538)**
Weston, Massachusetts
(April 29, 2016 – March 12, 2020)
FINRA Arbitration Case #15-00161

Rachael Leigh Konz (CRD #4040114)
Folsom, California
(December 4, 2018 – March 4, 2020)
FINRA Arbitration Case #16-02604

Jonathan Richard Lake (CRD #1385504)
Fairfield, Connecticut
(November 11, 2019 – March 11, 2020)
FINRA Case #20190631802/ARB190024/
Arbitration Case #17-02313

Douglas Anthony Leone (CRD #2453784)
Sandy Hook, Connecticut
(March 31, 2020)
FINRA Arbitration Case #18-01055

Yousuf Saljooki (CRD #5045123)
Melville, New York
(March 31, 2020)
FINRA Arbitration Case #19-00641

Ricardo Enrique Urrutia (CRD #5719923)
East Orange, New Jersey
(March 31, 2020)
FINRA Arbitration Case #19-01797

Frank Charles Wroblewski (CRD #824778)
East Setauket, New York
(March 9, 2020)
FINRA Arbitration Case #19-02705